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Trench, Rossi e Watanabe
Advogados

June 26, 2024

The Honorable P. Kevin Castel
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: General Electric Company v. Global Fiberglass Solutions of Texas, LLC
No. 23 Civ. 8346 (PKC)**

Dear Judge Castel:

We represent Plaintiff General Electric Company ("GE") in the above-captioned case against Defendant Global Fiberglass Solutions of Texas, LLC ("GFS"). We write in response to GFS's adjournment request, *see* ECF No. 44, of the initial conference scheduled for July 1, 2024, which GFS incorrectly identifies as scheduled for June 21, 2024.

Given GFS's failure to retain counsel and appear despite multiple extensions from the Court, as previously documented in GE's filing in opposition to GFS's third extension of time within which to respond to the Complaint, *see* ECF No. 18, GE opposes GFS's adjournment request. In that regard, GE notes that, while GFS represents that "Mr. [Michael] Bouman . . . has kindly agreed to support [it] in this matter," *see* ECF No. 44, GE confirmed on June 25, 2024, that Mr. Bouman does not represent any party to the litigation.

In light of the foregoing, the bases GFS cites in support of its adjournment request are inapposite, and GE is ready and willing to participate in the July 1 conference. GE thus respectfully requests that the Court deny GFS's adjournment request.

*Given the pending
motion for a default judgment,
there is no need for a conference.
as the July 1 conference is VACATED.
The motion to seal (ECF 34)
is provisionally granted and
should be terminated.*

SO ORDERED

*J. J. [Signature], VSDJ
6-27-24*

**Baker
McKenzie.**

Sincerely,



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